DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration

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Chicago District
300 S. Riverside Plaza, Suite 550 South
Chicago, Illinois 60606
Telephone: 312-353-5863

September 9, 1998

WARNING LETTER
CHI-39-98

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Daniel L. Peters, President
Nycomed Amersham Imaging Americas
101 Carnegie Center
Princeton, NJ 08540

Dear Mr. Peters:

An inspection was conducted of the Medi-Physics, Inc. radiopharmaceutical manufacturing facility, located at 3350 N. Ridge Ave., Arlington Heights, Illinois, from June 8 through July 2, 1998. The radiopharmaceutical products manufactured at this facility are drugs as defined by Section 201(g) of the Federal Food, Drug, and Cosmetic Act (the Act). The inspection was conducted by Investigators Mary K.Concannon and Bruce McCullough and the drug products covered included Indium DTPA, In-111 Injection; Thallous Chloride, TI-201Injection; NeoScan: Gallium Citrate, Ga-97 Injection; Technetium Tc-99m Generator and Sodium Iodide, I-123 Oral Capsules. The inspection covering the production of these drug products revealed significant deviations from Current Good Manufacturing Practice Regulations (CGMP), Title 21, Code of Federal Regulations, Part 211. These CGMP deficiencies cause these drug products to be adulterated within the meaning of Section 501(a)(2)(B) of the Act. The deviations reported included:

Failure to assure that the air supplied to the clean room used in the formulation and filling operations for NeoScan, Indium DTPA, and Thallous Chloride Injections is maintained under positive pressure.

Failure to perform viable particulate sampling during the production of pharmaceutical products in the clean room.

Failure to routinely monitor the gloves and gowns of employees after they have worked in the clean room.

Failure to assure that equipment used in the production of drug products are of adequate design in order to facilitate operations for its intended use and for its cleaning and maintenance. For example, the vent filters used in autoclaves number 3,5, and 6 are not integrity tested immediately after installation nor periodically during use.

Failure to retest or reexamine stoppered sterile vials that are assigned a one-year re-qualification date. There was no stability data which shows that the sterility of the vials throughout the one-year period is maintained.

Failure to validate the reprocessing procedures for the production of Technetum Tc 99m generators. The reprocessing procedures require replacing the fluid path assembly. The inspection revealed that you have no assurance that sterility is maintained following this reprocessing procedure.

Failure to establish and follow written procedures covering the cleaning and maintenance of equipment. For example, there were no written procedures for the cleaning of the [redacted] dispensing equipment.

SOP # 07-00-00, Repeat/Retest fails to assure that drug products conform to appropriate standards of identity, strength, quality, and purity because the procedure requires that if an investigation is not able to assign the cause of a test deviation, the testing should be repeated in duplicate, on new, or freshly drawn, samples. This procedure allows an original failing result to be overruled by two retests and the procedure allows new or freshly drawn samples to be tested without evidence that the original sample was not representative or was improperly prepared.

The above violations, as well as other significant violations, were listed on the Form FDA 483, List of Observations, which was issued to Ms. Susan K. Olinger, Director, Quality Assurance, at the close of the inspection. A copy is enclosed for your reference.

We acknowledge receipt of Mr. Harry E. Jeffreys response to the Form FDA 483, dated July 30, 1998. Mr. Jeffrey indicated that Medi-Physics Inc. has initiated a number of corrective actions in response to the investigators' findings and he provided estimated completion dates for these changes. You may reference Mr. Jeffreys' response in your response to this Warning Letter. Please discuss the status of the corrective actions Mr. Jeffreys indicated Medi-Physics was taking in your response.

The above listing of violations is not intended to be all-inclusive of the deficiencies at your facility. It is your responsibility to assure that your firm is adhering to each requirement of the Act. Federal agencies are advised of the issuance of all warning letters concerning drugs and devices so that they may take this information into account when considering the award of contracts.

You should take prompt action to correct these deviations. Failure to correct these violations may result in enforcement action being initiated by the Food and Drug Administration without further notice. These actions include seizure or injunction.

You should notify this office in writing, within 15 working days of receipt of this letter, of the specific steps you have taken to correct the noted violations. Your reply should be sent to the Food and Drug Administration, Chicago District Office, 300 S. Riverside Plaza, Suite 550 South, Chicago, IL 60606, Attention: George F. Bailey, Compliance Officer

Sincerely,

\s\
Raymond V. Mlecko
District Director